

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION**

UNITED STATES OF AMERICA	:	
	:	
vs.	:	CRIM. NO. 1:23-CR-00011-LAG
	:	
JOSHUA COLSTON	:	
	:	
Defendant.	:	
_____	:	

SUMMARY OF TESTIMONY OF EXPERT WITNESS
SPECIAL AGENT JOHN W. GOODPASTER

COMES NOW the United States of America, by and through its attorney, the United States Attorney for the Middle District of Georgia, and pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rules of Evidence 702, 703, and 705 files this Notice of Intent to Rely on Expert Witness at trial. The United States respectfully reserves the right to offer additional testimony by this expert and for this expert to amend or adjust his opinions and basis for those opinions due to information made known to him before or during trial.

JOHN W. GOODPASTER – SPECIAL AGENT, FBI

The United States intends to offer expert testimony from John W. Goodpaster, a Special Agent with the Federal Bureau of Investigation. SA Goodpaster's Curriculum Vitae, which includes his training and experience, the cases in which he has testified as an expert within the past four years (if any), as well as the publications he has authored in the past ten years (if any), is attached to this notice and was previously provided to Defendant in discovery at USAO_001495 to USAO_001496. Exhibit 1.

SA Goodpaster has been a law enforcement officer since 2000, and is currently employed as a Special Agent with the Federal Bureau of Investigation (FBI). As a Special Agent with the

FBI, he is responsible for investigating a myriad of federal criminal matters, to include federal firearms violations. He also serves as the Firearms Instructor for the FBI Columbus Resident Agency, the Valdosta Resident Agency, and the Albany Resident Agency. He has acquired knowledge and experience as to firearms and ammunition and the interstate nexus of firearms and ammunition, due to investigations, research, records, familiarity, conferring with other experts, training, teaching and certifications. He prepares reports and official correspondence relating to the identification, origin, and classification of firearms and ammunition under the provisions of federal firearms laws.

During the course of his duties, he has examined firearms and ammunition for the purpose of determining the manufacturer, model, caliber/gauge and serial number; the place of manufacturer, function and design, and/or status as related to the National Firearms Act. Part of this process has often involved the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) through the National Tracing Center, in which firearms traces concerning the manufacture and interstate/intrastate shipment of firearms were requested.

He is also a Certified Firearms Specialist, which certification was received through the International Firearms Specialist Academy, and has received formal law enforcement training as it pertains to firearms handling, manipulation, nomenclature, place of manufacture, and to the recognition and identification of firearms and ammunition. This training includes, but is not limited to the following:

- Georgia Bureau of Investigation (GBI) Academy (Georgia Peace Officer Standards and Training certified) - 2000
- GBI Firearms Instructor Certification - 2003
- Georgia POST General Instructor Certification - 2003

- GLOCK Armorer's Course - 2003
- GBI Rifle Course - 2003
- FBI Academy - 2005
- FBI Firearms Instructor Certification - 2018
- International Firearms Specialist Academy - 2019
- Certified Firearms Specialist Certification - 2019
- Daniel Defense M4 Armorer's Course - 2021
- Instructor M4 Carbine Course - Quantico - 2022
- Pistol Mounted Optic Transition Course - 2022

Opinions to be Elicited

SA Goodpaster is expected to testify that he examined the following firearms that were found in the Defendant's possession:

- one (1) Taurus, Model: G3C, 9mm semi-automatic pistol, Serial Number: ABH853441;
- one (1) Smith & Wesson, Model: SD40VE, .40 S&W caliber, semi-automatic pistol, Serial Number: FCR1434;
- one (1) Smith & Wesson, Model: M&P 15-22, .22 long rifle caliber, semiautomatic rifle, Serial Number: DEH2000;
- one (1) Armelegant, Model: ANG 4, 12 gauge, semi-automatic shotgun, Serial Number: 52-H21YD-8612;
- one (1) Henry, Model: H006 (Big Boy), .44 Remington Magnum caliber, lever-action rifle, Serial Number: BB0149861;

He will testify that he examined said firearms' markings which include, but are not limited to, the serial number, name of manufacturer, model, and caliber or gauge. SA Goodpaster will

also testify that he researched the firearms by referencing The Blue Book of Gun Values (Forty-First Edition). Based on his analysis and research, SA Goodpaster will opine that said firearms were manufactured in the following locations, and therefore traveled in interstate and foreign commerce.

- one (1) Taurus, Model: G3C, 9mm semi-automatic pistol, Serial Number: ABH853441 was manufactured by Taurus Armas in Brazil, and imported by Taurus International Mfg., Inc., Bainbridge, Georgia;
- one (1) Smith & Wesson, Model: SD40VE, .40 S&W caliber, semi-automatic pistol, Serial Number: FCR1434 was manufactured by Smith and Wesson in Springfield, Massachusetts;
- one (1) Smith & Wesson, Model: M&P 15-22, .22 long rifle caliber, semiautomatic rifle, Serial Number: DEH2000 was manufactured by Smith and Wesson in Springfield, Massachusetts;
- one (1) Armelegant, Model: ANG 4, 12 gauge, semi-automatic shotgun, Serial Number: 52-H21YD-8612 was manufactured by Armelegant Firearms in Konya, Turkey, and imported by SDS Imports, Knoxville, Tennessee;
- one (1) Henry, Model: H006 (Big Boy), .44 Remington Magnum caliber, lever-action rifle, Serial Number: BB0149861 was manufactured by Henry Repeating Arms Company in Bayonne, New Jersey;

SA Goodpaster's opinions and findings are contained in his FD_302 titled "Firearms Examination," which is attached to this notice and was previously provided to Defendant in discovery at USAO_000484 to USAO_000489. Exhibit 2.

Basis and Reasons for Opinions

SA Goodpaster's opinions are based on his examination and research of the submitted firearms, as well as his education, training, and experience. Exhibit 1. His opinions are outlined in his FD_302 titled "Firearms Examination." Exhibit 2.

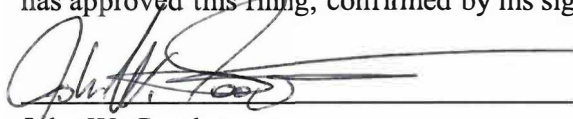
Witness Qualifications and Publications

SA Goodpaster's Curriculum Vitae outlining his qualifications and experience is attached as an exhibit hereto. This witness has not formally published any work.

Cases in Which the Witness has Previously Testified as an Expert

None.

Pursuant to Rule 16(a)(1)(G)(v), SA Goodpaster has reviewed this summary and filing, and has approved this filing, confirmed by his signature below.


John W. Goodpaster
Special Agent, FBI

RESPECTFULLY SUBMITTED, this 19th day of May, 2023.

PETER D. LEARY
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MIDDLE DISTRICT OF GEORGIA

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CERTIFICATE OF SERVICE

I, WILLIAM R. KEYES, Assistant United States Attorney, hereby certify that on the 19th day of May, 2023, I electronically filed the within and foregoing ***Summary of Testimony of Expert Witness Special Agent John W. Goodpaster*** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties of record.

PETER D. LEARY
UNITED STATES ATTORNEY
MIDDLE DISTRICT OF GEORGIA

BY: /s/ William R. Keyes

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